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Federal Communications Commission
Office of the Secretary

From: Pollack, Neil
Sent: Thursday, August 28, 2014 12:28 PM
To: 'Chairman Tom Wheeler'
Cc: Paulk, Gregg
Subject: E-Rate funding for Anderson Center for Autism
Importance: High

August 28, 2014

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CC: 02-6

Mr. Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street
Washington, DC 20554

Dear Chairman Wheeler,

I write regarding the recent rule changes being implemented by the Federal Communications Commission contained within the Modernization of the Schools and Libraries "E-Rate" Program and to discuss the impact these changes will have on our important educational program.

Anderson Center for Autism (ACA) is a New York State licensed residential school serving 138 children severely affected by autism; all of our students participate in the National School Lunch Program. Students are sent to ACA by public school districts. Due to the nature of their disability there is a continuum of education services from the classroom to their residential setting. Recognizing the importance that computer technologies have for children with autism who are mostly non-verbal, the New York State Education Department (SED) has approved our Technology Plan to support the infrastructure needed to provide technology across these two settings. In addition, SED has certified our current classroom structure of 6:1:3.5 ratio (6 students, 1 teacher and 3.5 assistants) as well as related special education services to meet the needs of these severely disabled handicapped students.

We understand the new ruling of \$150 per student is based on an average of 17 students per class. ACA therefore has and continues to lose a significant amount of funding since the maximum number of students in our classrooms is 6. With 41 education settings within our campus environment, the impact will be a severe funding gap that will negatively affect program quality.

We are hopeful to explore alternative options with the FCC and suggest that rather than only basing the rate per student, the FCC consider allowing the option of using the per classroom rate of \$2,500 or granting a waiver for special circumstances to ACA and like schools.

The impact for ACA from lack of FCC funding for the past two years has been devastating.

In 2013 our application to fund our award of \$121,000 for wireless connectivity was denied. This was an upgrade of previously approved hardware funding by the FCC in

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2004. Needless to say ACA's hardware was outdated, requiring replacement; the FCC's rule change left ACA with a sizeable deficit.

In 2014 we were again denied category 2 funding. This means our previously installed and now outdated systems including email, web servers, network servers and phone PBX system goes without necessary upgrades all of which is essential to supporting our learning environment.

I offer a more detailed explanation of the impact of the FCC rule change:

*Example: \$150 per student x 138 ACA students = \$20,700
\$2500 per education room x 41 rooms = \$102,500*

Under the previous rule, ACA was able to meet its technology needs. Using the new rules, we obviously can no longer meet the technological needs supporting high needs children with autism.

We ask that the FCC issue a waiver allowing ACA to calculate reimbursement for ACA on a per room basis versus per student. The rationale is that students are sent here by public schools for a more intensive program including smaller classrooms. Therefore, the calculation applied to ACA without consideration of their home school district average classroom sizes discriminates against these students. The \$2,500 per education room however resolves the issue.

We appreciate FCC's response to this critical matter and its effect on ACA's ability to provide quality educational services via high-speed Internet connectivity for children with autism. I can be reached at 845-889-9203. Also available to discuss details is our Gregg Paulk who is our Director of Information Technologies. He can be directly contact at GreggPaulk@acenterforautism.org or 845.889.9205.

Very respectfully yours,

Neil

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